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9 *Attorney for Defendant Maria Baltazar*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,

13 CASE NO. 2:21-cr-00058-CDS-EJY-3

14 Plaintiff

15 vs.

16 **Stipulation and Order to Continue**
17 **Sentencing (First Request)**

18 MARIA BALTAZAR,

19 Defendant

20 It is hereby stipulated by and between Maria Baltazar (the “Defendant” or “Ms. Baltazar”) by and through her counsel, Crane M. Pomerantz, Esq., of the law firm of Clark Hill PLLC and the Plaintiff, United States of America, by and through Jason Frierson, United States Attorney and Melanee Smith, Assistant United States Attorney, that the sentencing hearing currently scheduled for June 1, 2023, at 10:00 a.m. be vacated and re-set to June 12, 2023, at a time convenient to the Court.

21 This Stipulation is entered into for the following reasons:

22 1. On March 3, 2023, Ms. Baltazar entered her guilty plea pursuant to a written plea agreement. Sentencing in this matter is currently scheduled for June 1, 2023 at 10:00 a.m.

23 2. Counsel for Ms. Baltazar has a personal family matter to attend to outside the District of Nevada on June 1, 2023. Counsel seeks a very brief continuance to attend to this matter.

3. Counsel has been in touch with the court's courtroom deputy, who provided an alternative date of June 12, 2023. This is acceptable to all parties. Counsel for the government has another sentencing at 10am that day.

4. Ms. Baltazar is not in custody and agrees to this continuance.

5. The additional time requested herein is not sought for purposes of delay and the denial of this request for a continuance could result in a miscarriage of justice.

6. Federal Rule of Criminal Procedure 32(b)(2) permits this court to continue a sentencing hearing for good cause. Good cause exists in this case.

7. For all the above-stated reasons, the ends of justice would be best served by a continuance of the sentencing hearing.

8. This is the first request for a continuance of the sentencing hearing.

UNITED STATES ATTORNEY
DISTRICT OF NEVADA

CLARK HILL PLLC

/s/Melanee Smith
MELANEE SMITH
Assistant United States Attorney

/s/Crane Pomerantz
CRANE M. POMERANTZ

DATED this 15th day of May, 2023.

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1	UNITED STATES DISTRICT COURT
2	DISTRICT OF NEVADA
3	UNITED STATES OF AMERICA,
4	Plaintiff
5	vs.
6	MARIA BALTAZAR,
7	Defendant
8	

CASE NO. 2:21-cr-00058-CDS-EJY-3

FINDINGS OF FACT,
CONCLUSION OF LAW, AND
ORDER

9

10 Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court
11 hereby finds that:

12 1. On March 3, 2023, Ms. Baltazar entered her guilty plea pursuant to a written plea
13 agreement. Sentencing in this matter is currently scheduled for June 1, 2023 at 10:00 a.m.

14 2. Counsel for Ms. Baltazar has a personal family matter to attend to outside the
15 District of Nevada on June 1, 2023. Counsel seeks a very brief continuance to attend to this matter.

16 3. Counsel has been in touch with the Court's courtroom deputy, who provided an
17 alternative date of June 12, 2023. This is acceptable to all parties. Counsel for the government
18 has another sentencing at 10am that day.

19 4. Ms. Baltazar is not in custody and agrees to this continuance.

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21 denial of this request for a continuance could result in a miscarriage of justice.

22 6. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a
23 sentencing hearing for good cause. Good cause exists in this case.

24 7. For all the above-stated reasons, the ends of justice would be best served by a
25 continuance of the sentencing hearing.

26 8. This is the first request for a continuance of the sentencing hearing.

27

ORDER

IT IS HEREBY ORDERED that the sentencing hearing in this matter scheduled for June 1, 2023, at the hour of 10:00 a.m. is hereby vacated and continued to June 12, 2023, at the hour of 11:00 a.m. in courtroom 6B.

DATED this 16th day of May, 2023.

CRISTINA D. SILVA
UNITED STATES DISTRICT JUDGE